Case: 4:23-cr-00384-RWS Doc. #: 15 Filed: 08/11/23 Page: 1 of 2 PageID #: 29

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,))
Vs.) No. 4:23 CR 00384 RWS-SPM
BARRRY YOUNG,)
)
Defendant.)

MOTION FOR PRE-TRIAL DETENTION

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorney for said District, and files this motion for detention pursuant to Title 18, United States Code, Section 3141(f)(2). As and for its grounds, the Government states as follows:

- 1. Defendant is charged with five counts of passing and uttering counterfeit currency, in violation of 18 U.S.C. §472. Doc. 1.
- According to an investigation conducted by the United States Secret Service and local law enforcement, the defendant passed counterfeit currency on several occasions in February and March 2023.
- 3. As is accurately reflected in the Pretrial Services Report, the defendant is a convicted felon with numerous prior felony and misdemeanor convictions in multiple states. Doc. 13. The defendant has pending charges and active warrants in Illinois, Missouri, Tennessee, and Mississippi. Further, the defendant is a

chronic absconder with an extensive history of failing to appear. The defendant also has no known ties to the Eastern District of Missouri and an unconfirmed home plan.

- 4. Pursuant to The Bail Reform Act, a court may hold a hearing on its own motion or the government's motion in a case that involves a serious risk of flight or a serious risk that the person will obstruct or attempt to obstruct justice; threaten, injure, or intimidate or attempt to threaten, injure, or intimidate a prospective witness or juror. 18 U.S.C. §3142(f)(1), (2).
- 5. In this case, the defendant is a serious flight risk. He has a lengthy criminal history, replete with instances of flight and non-appearance; a documented history of drug abuse; and no known ties to the community. Thus, the Government requests that this Court order the defendant's detention.

WHEREFORE, the Government requests this Court to order the defendant be detained pending trial.

Respectfully submitted,

SAYLER A. FLEMING UNITED STATES ATTORNEY

<u>/s/ Jennifer J. Roy</u>

Jennifer J. Roy #47203MO ASSISTANT UNITED STATES ATTORNEY Thomas F. Eagleton Courthouse 111 South Tenth Street, 20th Floor St. Louis, Missouri 63102 (314) 539-2200